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March 25, 2022

**VIA ECF**

 Honorable Loretta A. Preska  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007-1312

**Re: *Giuffre v. Dershowitz*, Case No.: 19-cv-03377-LAP**  
**Stipulation re: Plaintiff's Proposal re: Netflix Documents (ECF No. 443)**

Your Honor:

As discussed on the record at yesterday's telephonic hearing, in order to proceed with the taking of Plaintiff's deposition in the month of April as ordered by the Court, Prof. Dershowitz hereby confirms his acceptance of Plaintiff's proposal as set forth in her letter dated March 22, 2022 (ECF No. 443). Prof. Dershowitz and his counsel in this action hereby affirm that we have not seen or otherwise learned the contents of any documents produced by the Netflix Nonparties with a "confidential" or "highly confidential" designation in *Dershowitz v. Netflix*, beyond the general description which counsel for the Netflix Nonparties provided to us and to Plaintiff's counsel. Further, we affirm that with the *Netflix* litigation now having terminated, we will allow Prof. Dershowitz's counsel in the *Netflix* litigation to destroy or return those documents pursuant to the terms of the protective order in that case, without us having seen them or otherwise learned of their contents (again, excepting the general description which counsel for the Netflix Nonparties supplied to us and to Plaintiff's counsel).

**SO ORDERED**

*Loretta A. Preska*  
 LORETTA A. PRESKA  
 UNITED STATES DISTRICT JUDGE

Respectfully submitted,

*/s/ Christian G. Kiely*  
 Christian G. Kiely

cc: All counsel of record, via ECF

*3/28/22*